

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KENTON SMALLWOOD, CATHERINE)	
CHRISTENSEN, RAHSAAN RENFORD,)	
and BERTHIL IVARSON, individually and)	
on behalf of the Class, and others similarly)	CASE NO. 1:09-CV-4072
situated,)	
)	
Plaintiffs,)	
)	
vs.)	
)	District Judge Sharon Johnson Coleman
ILLINOIS BELL TELEPHONE COMPANY,)	
)	Magistrate Judge Morton Denlow
Defendant.)	
)	

**JOINT MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION
SETTLEMENT AND CERTIFICATION OF THE SETTLEMENT CLASS**

Plaintiffs Kenton Smallwood, Catherine Christensen, Rahsaan Renford, and Berthil Ivarson, on behalf of themselves and other Opt-In Plaintiffs (collectively, “Plaintiffs”) and on behalf of the Rule 23 Settlement Class, and Defendant Illinois Bell Telephone Company (“Defendant” or “Illinois Bell”), respectfully request that this Court grant their motion for Preliminary Approval of Class Action Settlement and Certification of the Settlement Class. In support of this Motion, the parties submit a memorandum of law and supporting evidentiary materials.

WHEREFORE, Plaintiffs and Defendant request an Order:

- A. granting preliminary approval of the Joint Stipulation of Settlement;
- B. provisionally certifying the proposed settlement class of Outside Plant Engineers pursuant to Rule 23(e) of the Federal Rules of Civil Procedure in connection with the settlement process;
- C. appointing Nichols Kaster, PLLP as Class Counsel for the Rule 23 Class Members and the Named Plaintiffs as Class Representatives;
- D. approving the Parties' proposed notice of settlement;
- E. approving the proposed class action settlement procedure;
- F. approving the FLSA settlement;
- G. setting a date for Plaintiffs to file a motion for final settlement approval and a petition for an award of attorneys' fees and costs; and
- H. scheduling the Fairness Hearing.

Dated: November 18, 2010

Respectfully submitted,

By: /s/ Timothy C. Selander
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